UNITED STATES BANKRUPTCY COURT NORTHERN DISTRICT OF GEORGIA GAINESVILLE DIVISION

IN RE:)	CHAPTER 11
PARK MERIDIAN, LLC,)	CASE NO: 15-20447-JRS
THE MERIDIAN, ELC,)	Cholino. 13 20447 grad
Debtor.)	

LIMITED MOTION TO KEEP BANK ACCOUNT OPEN

COMES NOW, Park Meridian, LLC, Debtor and Debtor-in-Possession, and files this Limited Motion to Keep Bank Account Open and in support thereof, respectfully represents:

- 1. Debtor filed its petition for relief under Chapter 11, Title 11 of the United States Code (the "Bankruptcy Code") on March 2, 2015 (the "Petition Date"). The Debtor owns commercial real property and improvements thereon located at 3890 Johns Creek Parkway, Suwanee, Forsyth County, Georgia.
- 2. Debtor has continued in possession of its property and continues to operate as debtor in possession per 11 U.S.C. §§ 1107 and 1108.
- 3. Debtor is in the process of opening its debtor-in-possession accounts. However, Debtor's business will be severely disrupted if its pre-petition account is closed immediately.
- 4. The Debtor seeks the authority of the Court to keep its pre-petition account with Wells Fargo Bank, N.A. for a reasonable time to allow transition to debtor-in-possession accounts with minimal interruption. Attached hereto as <u>Exhibit "A"</u> is information concerning the bank account with Wells Fargo Bank's address and the account number.

WHEREFORE, Debtor prays that the Court grant its Limited Motion to Keep Bank Account Open, and that it have such other and further relief as is deemed just and proper.

On this 3rd day of March, 2015.

MACEY, WILENSKY & HENNINGS, LLC

/s/ David W. Gordon
David W. Gordon, Esq.
Georgia Bar No. 726483

303 Peachtree Street, N.E. Suite 4420 Atlanta, GA 30308 (404) 584-1200 (404) 681-4355 – Facsimile dgordon@maceywilensky.com

Exhibit "A"

Park Meridian, LLC Bank Account

Bank: Wells Fargo Bank, N.A. 101 N. Phillips Avenue Sioux Falls, SD 57104

Account Number: 2000023563836

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CERTIFICATE OF SERVICE

I certify that a copy of the foregoing **Limited Motion to Keep Bank Account Open** was served by depositing a copy of same in the United States Mail, first class postage prepaid, addressed to:

Office of United States Trustee 362 United States Courthouse 75 Spring Street, S.W. Atlanta, Georgia 30303

AND

The Twenty Largest Unsecured Creditors as shown on Exhibit "A" attached hereto.

This 3rd day of March, 2015.

MACEY, WILENSKY & HENNINGS, LLC

/s/ David W. Gordon
David W. Gordon, Esq.
Georgia Bar No. 726483

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EXHIBIT "A"

PARK MERIDIAN, LLC

LIST OF CREDITORS HOLDING 20 LARGEST UNSECURED CLAIMS

AT&T c/o Bankruptcy 1801 Valley View Lane Dallas, TX 75234

Forsyth County Water 110 East Main Street, #150 Cumming, GA 30040

Gail Pollock 8143 Valhalla Drive Delray Beach, FL 33443

Highgrove Partners, LLC c/o James McCutcheon 7730 The Bluffs Austell, GA 30168

Jackson Corporate Real Estate 101 Marietta Street 31st Floor Atlanta, GA 30303

Regency Enterprises, Inc. 195 Chastain Meadows Court Suite 100 Kennesaw, GA 30144

Sawnee EMC 543 Atlanta Highway Cumming, GA 30040

Sure Tech Services, Inc. P. O. Box 884 Jefferson, GA 30549